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20 Attorneys for Defendants Sacramento Valley Limited Partnership
21 d/b/a Verizon Wireless; Epic Wireless; and Andrew Lesa

22
23 IN THE UNITED STATES DISTRICT COURT
24 FOR THE DISTRICT OF NEVADA

25 GREGORY O. GARMONG,
26
27 Plaintiff,

28 v.

29 LYON COUNTY, NEVADA; LYON
30 COUNTY BOARD OF
31 COMMISSIONERS; SMITH VALLEY
32 FIRE PROTECTION DISTRICT;
33 MICHAEL P. BOUDREAU;
34 SACRAMENTO VALLEY LIMITED
35 PARTNERSHIP d/b/a VERIZON
36 WIRELESS; EPIC WIRELESS;
37 ANDREW LESA, all in their individual
38 and official capacities,

39 Defendants.

CASE NO: 3:17-cv-00701-RCJ-CBC

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
FILE RESPONSIVE PLEADING**

(First Request)

1 COME NOW, Plaintiff Gregory O. Garmong, ("Plaintiff") and Defendants,
2 Sacramento Valley Limited Partnership d/b/a Verizon Wireless, Epic Wireless and
3 Andrew Lesa ("Defendants"), by and through their undersigned counsel, and hereby
4 stipulate to an extension of time wherein Defendants may file a responsive pleading to
5 the Amended Complaint, up to and including September 7, 2018.

6 Pursuant to LRIA 6-1, Defendants' undersigned local counsel of record admits
7 and accepts personal responsibility for incorrectly conflating the addition of three (3)
8 days from NRCP 6(e) with the lack thereof in FRCP 6(d) upon receipt of electronic
9 service of the subject Amended Complaint. Upon his realization of that error, however,
10 the undersigned immediately called Plaintiff's counsel, admitted the error, apologized for
11 it, and requested the courtesy of a three (3) day extension. Since the parties hereto
12 agree, through their counsel, that the subject error was made in good faith, does not
13 prejudice the Plaintiff and prompt remedial action was taken, they respectfully and

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1 jointly request this Court approve the requested extension.

2 RESPECTFULLY SUBMITTED this 5th day of September, 2018.

3 McGUIRE WOODS LLP

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5 By: /s/ Carl M. Hebert
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21 Attorneys for Defendants
22 Sacramento Valley Limited Partnership
23 d/b/a Verizon Wireless; Epic Wireless;
24 and Andrew Lesa

25 IT IS SO ORDERED.

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28 UNITED STATE MAGISTRATE JUDGE

DATED: 11-2-2018